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Canova, Judy

From: scott.glum@epa.ohio.gov
Sent: Monday, July 2, 2018 8:58 AM
To: Linnear, David
Subject: FW: Pristine Trust - Proposed Change to MNA Pilot Study
Attachments: Pristine MNA proposal - May 2, 2018.docx

Hello David. Just checking in. Did you ever approve the Proposal for MNA Pilot Program Amendment submitted by The Pristine Trust (attached)?

I hope all is going well.

-Scott

Scott Glum

Site Coordinator

Ohio Environmental Protection Agency

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scott.glum@epa.ohio.gov**From:** Ronald Pitzer**Sent:** Wednesday, May 02, 2018 5:34 PM**To:** David Linnear (linnear.david@epa.gov)**Cc:** DiCosmo.Nefertiti@epa.gov; Short, Thomas ; Wilson, David ; Glum, Scott ; Hayward, Julian ; Cooke, Henry ; Phil and martha ; Peggy Dewan ; Ronald Pitzer**Subject:** Pristine Trust - Proposed Change to MNA Pilot Study

David,

In response to your email to me on April 6, 2018, attached is a letter from the Pristine Trustees containing the proposed change to the MNA Pilot Study at the Pristine Site to initiate groundwater gradient control for the off-site 1,2-DCA plume as discussed at our meeting on February 6, 2018. A signed copy of the letter will also be sent to you and the addresses for your files.

Let me know if you have any questions. Thank you.

Ron



Did You Know: Children of parents who talk to their teens about drugs are up to 50% less likely to use. Start the conversation: StartTalking.Ohio.Gov

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PRISTINE FACILITY TRUST FUND

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May 2, 2018

Mr. David Linnear
United States Environmental Protection Agency
Region V, Mail Code (SR-6J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Proposal for MNA Pilot Program Amendment, Pristine, Inc. Site, Reading, Ohio

Dear Mr. Linnear:

This letter responds to your e-mail to me, dated April 6, 2018, and provides the Pristine Trustees' proposal for amendment of the Monitored Natural Attenuation (MNA) Pilot Program for the Pristine Inc. Site.

As you know, the potential application of MNA for the off-site 1,2-DCA plume area has been the subject of considerable discussion, most recently at our meeting in Chicago on February 6, 2018. At that meeting, the Trustees and their consultant, GHD, provided EPA an overview of the site setting, groundwater use, regional contamination, technical challenges, and related information that supports MNA for the off-site 1,2-DCA plume. In response, EPA and its consultant, S.S. Papadopoulos & Associates, summarized the Agency's concern that, while natural attenuation of VOCs is occurring, there is a risk of migration of the plume were MNA to be formally adopted at this time.

While the Trustees and GHD still believe that MNA is the best solution for the off-site plume, the concept of a hybrid approach for MNA with groundwater gradient control was introduced by EPA's consultant at the meeting. The Trustees have discussed that possibility with GHD, and are willing to investigate such a hybrid approach for MNA for the off-site plume.

Given the following site factors, the Pristine Trustees continue to believe that MNA is the most appropriate and practicable approach for addressing residual VOCs in the off-site 1,2-DCA plume area:

- Pump and treat technology has achieved significant reductions in VOC concentrations over the last 20 years, but is no longer effective or efficient due to low dissolved VOC concentrations and back diffusion of VOCs that may be sorbed to soil below the water table.
- Regional contamination persists and continues to threaten being drawn into operating extraction wells and more broadly threatens the attainment of performance goals.
- The presence of regional contamination is indicated by continued detections of PCE, TCE and various degradation products outside of the 1,2-DCA plume area, to the north, west, and southwest of the Pristine site.
- Potential future groundwater use in the region is impaired by the presence of regional contamination (and natural conditions).
- There are no down-gradient groundwater receptors that could be impacted by the 1,2-DCA plume.

Even in consideration of these factors, and in a spirit of cooperation with EPA, the Pristine Trust is willing to undertake the suggested MNA hybrid approach, i.e., MNA enhanced with gradient control.

In our proposal, the southernmost extraction well, EW5, would be used to withdraw for treatment groundwater at a rate of approximately 50 GPM. This rate was selected based on the shallow gradient conditions observed to the south of EW5 prior to cessation of off-site pumping in 2011, when EW5 was operating at around 85 GPM. Although the proposed 50 GPM rate is expected to mitigate plume migration, the potential for drawing in regional contamination through pumping will still exist. Monitoring would be conducted to determine hydraulic response and changes in VOC concentrations at the 50 GPM rate over time, consistent with existing procedures. Adjustments to the pumping rate would be undertaken depending on the water level information, with the objective of controlling the gradient, while minimizing potential effects from regional contamination.

Please note that before presenting this proposal the Trustees reviewed it with General Electric and its consultant, enabling them to consider the possible effects of pumping EW5 on their nearby on-site remediation system. They informed us that they do not anticipate detrimental effects on their system resulting from pumping EW5 at the rate of 50 GPM, but they agree that ongoing monitoring data from both systems will need to be examined in light of the new pumping regime.

The Trustees are prepared to implement this proposal for offsite extraction well pumping using EW5 within 90 days of receipt of EPA's approval. At GHD's recommendation, the Trustees anticipate that EW5 pumping and monitoring would continue for up to 2 years, at which time an assessment would be made with recommendations for next steps, including possibly continuing EW5 pumping or terminating EW5 pumping for ultimate transition to MNA.

Please let us know if you have any questions about the Trustees' proposal. We are ready to move forward with it as soon as we receive EPA's written approval.

Sincerely,

Ronald L. Pitzer
On Behalf of the Pristine Trustees

cc: Nefertiti DiCosmo (U. S. EPA)
Tom Short (U. S. EPA)
Dave Wilson (U. S. EPA)
Scott Glum (Ohio EPA)
Julian Hayward (GHD)
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